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**To:** USPTO

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**From:** Chris Keirs

**Client/Matter #:** 221-0073US

**Re:** s/n 10/679,908

**Pages (including cover page):** 5

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### COMMENTS:

Attached for filing in connection with application serial no. 10/679,908 filed 10/06/2003 and entitled Undersea Hydraulic Coupling for Use With Manifold Plates is:

4-page Reply Brief

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MAY 05 2006

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:

Robert E. Smith III

Serial Number: 10/679,908

Filed: 10/06/2003

For: UNDERSEA HYDRAULIC  
COUPLING FOR USE WITH  
MANIFOLD PLATES§  
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Confirmation No. 3821

Examiner: Thomas A. Beach

Group art unit: 3671

Atty Docket No. 221-0073US

Commissioner for Patents  
P. O. Box 1450  
Alexandria, Virginia 22313-1450REPLY BRIEF

The Examiner's Answer states that the following grounds of rejection are applicable to the appealed claims. Applicant's reply to each is set forth in square brackets.

"Claims 1-9 are rejected under 35 U.S.C. 102(b) as being anticipated by Smith 5,015,016. Smith shows an undersea hydraulic coupling member having a tail 74 (see figure 3), at least one substantially rigid positioning member 26 associated with the tail, wherein the substantially rigid positioning members are in contact with the inner bore 73 of a manifold plate when the tail is inserted through the manifold plate (unnumbered in figure 1).

[Even ignoring the issue of whether male probe 74 of the Smith016 connector may be considered a "tail" as that term is used in the subject

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By:

  
Christopher D. Keirs, Reg. No. 32,248

Date: MAY 5, 2006

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claims, element 26 of the Smith016 reference is simply not in contact with the inner bore of a manifold plate as required by claim 1. Rather, element 26 is provided "for sealing between the receiving bore 61 and the outer circumference of the male member 13." {col. 6; lines 9-14} The manifold plates are shown in phantom at the top and bottom of Fig. 6 of the Smith016 reference. As may be seen in Fig. 6, element 26 is not in contact with element 73 as the Examiner's Answer contends.]

"As concerns claims 2 & 8, Smith shows the substantially rigid positioning member is an o-ring 26 (figure 3).

[Element 26 of Smith016 is described as an "annular or axial soft seal." However, the seals in hydraulic couplings that engage the male member about its circumference "generally resemble O-rings." {col. 1; lines 26-32}]

"As concerns claims 3 & 9, Smith shows the substantially rigid positioning member is elastomeric."

[The annular soft seals 26 and 27 are of a relatively pliable material, for example, rubber or synthetic elastomer. {col. 6; lines 14-16}]

"As concerns claim 4, Smith shows a retaining ring to attach the hydraulic coupling member to the manifold plate (figures 1 and 3)."

[The coupling members of Smith016 are attached to the manifold plates by threads on their tails. "Threads 73 may be added to the external surface to facilitate attachment to a coupling manifold, as explained above, or the external surface may be machined smooth and the probe 13 may be attached to the manifold by means of set screws (not shown)." {col. 7; lines 8-12} The disadvantages of this attachment method are what the subject invention addresses.]

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"As concerns claim 5, Smith shows the retaining ring is held in place with a snap ring 55 contained in a groove in the tail (figure 3)."

[Element 55 of Smith016 is not a snap ring. It is an annular metal C-seal. {col. 5; line 37} The only element of Smith016 resembling a snap ring is retainer clip 24 which secures sleeve member 22 in the bore of the female member. "The movement of the sleeve member 22 is limited by retainer clip 24, in the female member bore." {col. 8; lines 46-48}]

"As concerns claim 6, Smith shows the tail has at least two grooves for containing the snap ring to accommodate manifold plates of different thicknesses (figure 3)."

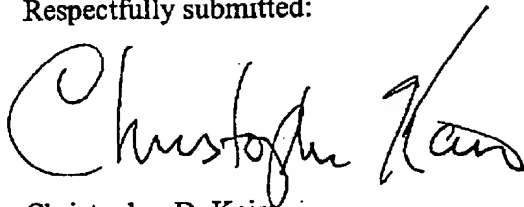
[The Examiner contends that element 74 of Smith016 may be considered a "tail." As may be clearly seen in the cross-sectional view of Figure 4, probe 74 of the Smith016 connector has no grooves for containing a snap ring.]

#### Summary

The claims require a hydraulic coupling comprising a tail with an associated, substantially rigid, positioning member that is in contact with the inner bore of a manifold plate when the tail is inserted through the manifold plate. The tails of the male and female members of the Smith016 connector are threaded for conventional mounting on manifold plates. Moreover the cited reference has no substantially rigid, positioning member that is in contact with the inner bore of a manifold plate when the tail is inserted through the manifold plate. Accordingly, the cited reference does not anticipate the claimed invention under §102(b).

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Respectfully submitted:

A handwritten signature in black ink, appearing to read "Christopher Keirs". The signature is fluid and cursive, with a large initial "C" and a stylized "K".

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